



October 17, 2007

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

CS Docket No. 98-120
MB Docket No. 07-91

Re: Multicast Must Carry of Foreign Language Programming

Dear Chairman Martin:

I write to commend your continuing efforts to promote the transition to digital television and, particularly, your support for mandatory cable carriage of digital multicast programming streams. Multicast must carry will be vital to ensuring that television stations are able to take full advantage of digital transmission and, equally important, to ensuring that viewers will realize the benefits of the diverse programming streams that digital transmission makes possible. As our experience demonstrates, multicast must carry is especially important to stations that program to niche audiences, such as foreign language speakers.

I am CEO of International Media Group, Inc., parent of KSLS, Inc., the licensee of full-power television stations KSCI(TV) and KSCI-DT, Long Beach, California. KSCI(TV) broadcasts primarily Asian-language programming: ten or more different languages in a given week, including offerings in Mandarin, Filipino (Tagalog/Taglish), Korean, Japanese, and Vietnamese. We produce at least four hours of Asian-language programs daily, including news, public affairs, and cultural shows specifically designed for the significant Asian-American population within the Los Angeles DMA. We currently simulcast this schedule on the primary channel of KSCI-DT. Additionally, we provide this material to viewers in part of the San Diego market through our low-power station, KUAN-LP, Poway. A sister station, KIKU(TV)/DT, Honolulu, Hawaii, also broadcasts over 100 hours of multicultural programming in five different languages each week, including over thirty hours of Japanese-language programs.

As you may well imagine, programming to so many diverse ethnic groups involves constant judgment calls: KSCI cannot provide a new program in Vietnamese or Korean without cutting back our Mandarin or Japanese schedule, or vice versa. We broadcast a 24/7 programming schedule, but even that is often not enough. Digital multicasting would appear at first glance to provide an ideal way to reach additional multicultural

audiences. However, under current Commission rules, which do not require cable systems to carry additional digital program streams, the multicast channels will not reach much of our targeted audience.

Although Asian-Americans, as with other minority groups, tend to rely more than the average viewers on free, over-the-air broadcasts, there are large numbers in the Los Angeles area who would not be able to receive our digital multicast programs. They may live in multiple-dwelling units where, for reasons of cost or architecture, they are unable to install rooftop antennas and where commonly available indoor digital antennas are insufficient to pick up a reliable signal. Additionally, post-transition, KSCI-DT will share DTV Channel 18 with KUSI-DT in the adjacent San Diego market. As we have previously explained to the Commission, we are apprehensive that following the termination of analog broadcasting, many of our Asian-language viewers will find that our signal is blocked by the English-language syndicated fare from San Diego.¹

We cannot justify the production expenses, secure the cooperation of programming partners, or sell advertising time for multicast programming where there is such a significant danger of not reaching our target audience. Only cable carriage of multicast channels can provide the assurance that program producers and advertisers find necessary to the production of quality foreign-language programming for U.S. audiences.

KSCI-TV is currently providing a multicast channel of Armenian-language programming produced by a Los Angeles company doing business as The Armenian TV Network. This company has gone to the effort of striking a deal with an electronics manufacturer for the supply of reasonably priced digital-to-analog converters, so that its audience will be able to view the network's programming on their analog televisions. It is the availability of this new, targeted programming that is pushing the Armenian-American community in Los Angeles to rush into the era of digital television with open arms. This solution will not be effective, however, for those viewers who cannot receive an over-the-air signal; nor will it be effective against post-transition co-channel interference. Again, only cable carriage of multicast channels will ensure the availability of this valuable source of specialized programming to its intended audience.

Other producers of ethnic programming have also informed us of their interest in expanding offerings on KSCI-DT's digital channels. Korean and Filipino producers are seeking to expand existing schedules in their languages on KSCI. Additionally, digital multicast channels may possibly be used for the presentation of news, entertainment, and cultural offerings in Russian and Italian. All of these possibilities require the ability to reach target audiences with certainty.

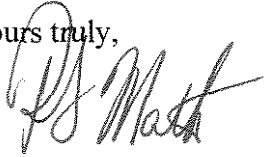
Chairman Martin, I have noted with appreciation your comments before the Congressional Hispanic Caucus earlier this month. Your efforts to achieve the full fruits of the digital transition for Spanish-language television viewers are laudable. What's more, the same efforts will yield positive results among members of other ethnic groups who still rely on their native languages in their quest to experience the American dream.

¹ See "Comments of KSLS, Inc." in MB Docket No. 07-91, filed August 15, 2007.

We and other broadcasters are willing to produce and provide a wealth of foreign-language programming as long as there is a way to make it a viable business. Currently, and for the foreseeable future, that requires cable carriage of these multicast channels.

Please let me know how I can assist you in achieving this important public policy goal.

Yours truly,

A handwritten signature in black ink, appearing to read "P. Mathes", written over the closing "Yours truly,".

Peter Mathes
Chief Executive Officer
International Media Group, Inc.

cc: Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert M. McDowell